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February 8, 2021

VIA ECF

Honorable Joseph A. Dickson, U.S.M.J.
United States District Court
District of New Jersey
M.L. King, Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Krishanthi, et al. v. Rajaratnam, et al.*
Civil Action No. 09-5395 (BRM)(JAD)

Dear Judge Dickson:

Plaintiffs have filed a proposed scheduling order today regarding the completion of Phase 1 discovery. Your Honor's Text Order dated December 15, 2020 [ECF 445] required that the proposed order be on joint submission.

The parties have not been able to reach agreement on the form of order. Thomas Valen, counsel for Defendants, has asked me to indicate that this submission is not joint and that Defendants intend to file a separate submission. If Defendants' submission is other than a competing form of order, Plaintiffs reserve the right to respond.

Respectfully submitted,

/s/ Joseph J. DePalma

Joseph J. DePalma

JJD:cd
Enclosure
cc: All Counsel (via ECF)